UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

)	
IN RE OPTIMAL U.S. LITIGATION)	
)	No. 10-cv-4095 (SAS)
)	ECF CASE
)	

LEAD PLAINTIFFS' MOTION FOR RECONSIDERATION CONCERNING THE DISMISSAL OF THE SANTANDER PLAINTIFFS

PLEASE TAKE NOTICE that, upon the Lead Plaintiffs' Memorandum of Law in Support of Their Motion for Reconsideration Concerning the Dismissal of the Santander Plaintiffs, Lead Plaintiffs hereby move this Court, pursuant to Local Civil Rule 6.3, before the Honorable Shira A. Scheindlin, United States District Court Judge, at the United States Courthouse, 500 Pearl Street, New York, New York, on a date and time to be determined by the Court, for an Order granting their motion for reconsideration and denying Defendants' motion to dismiss the claims of the Santander Plaintiffs based on the forum selection clause in the Account Agreement, and for such other and further relief as the Court may deem just and proper.

May 16, 2011 Respectfully submitted,

/s/ Javier Bleichmar

LABATON SUCHAROW LLP

Joel H. Bernstein (JB-0763) Javier Bleichmar (JB-0435) Alan I. Ellman (AE-7347) 140 Broadway New York, New York 10005 Tel: 212-907-0700

Fax: 212-818-0477 jbernstein@labaton.com jbleichmar@labaton.com

aellman@labaton.com

EDWARD W. MILLER (EM-8489) 648 Franklin Avenue, 2nd Floor Garden City, New York 11530 Tel: (516) 280-7377 edmilleresq@aol.com

Counsel for Lead Plaintiffs and Lead Counsel for the Class